



MEMBER OF THE FREQUENTIS GROUP

DRAFT

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FINAL

WEB (INTERNET SITES, APPS, SOCIAL PROFILES, WEB SERVICES) PERSONAL DATA PROCESSING POLICY

GDPR-006.EN

ISO9001 | ISO27001 | EU2016/679

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Web (Internet Sites, Apps, Social Profiles, Web services) Personal Data Processing Policy

Notes for the reader:

This information is applicable to all websites, Apps, social profiles and services whose domains or property are registered or traceable to the Company **Regola S.r.l.** However, this is a general document intended to be supplemented each time by detailed information available on individual pages or when required by specific services offered (e.g. allerteitalia.it, FlagMii App, ...).

When "we", "us" or "our" are used in this information document, they refer to Regola S.r.l.

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1. To whom this policy is addressed

- 1.1. This policy, pursuant to articles 13 and 14 of (EU) Regulation n. 679, of 27 April 2016, (hereinafter «Regulation»), illustrates how we *process* personal data collected during your use of the applications and services we offer on the internet. We are aware of the importance of safeguarding your privacy and since the Internet is notoriously problematic as a tool for the secure circulation of information, we make every possible and proportionate

effort to guarantee the confidentiality of your personal data and the protection of your personal rights and freedoms.

- 1.2. As a User, you are considered a data subject pursuant to art. 4.1 of the Regulation and as such you have the right to receive all information from us relating to the processing of your personal data in a concise, transparent, intelligible and easily accessible form.

2. Who are the Data Controller and the Data Protection Officer?

- 2.1. The Data Controller is **REGOLA S.r.l.**, Corso F. Turati, 15/H - Turin (Italy) – VAT. N. 06860880019 – REA no.: 818093.

You can contact the Data Controller by using the following:

E-mail: privacy@regola.it

PEC: regola@legalmail.it

Tel. +39 011 5187029

- 2.2. **Data Protection Officer**

We are very careful about the security of the data processed, particularly regarding information that may contain personal data or special categories of personal data. For this reason, in order to always guarantee the utmost compliance with current legislation, we have appointed a Data Protection Officer (DPO) pursuant to art. 37 of the Regulation.

You can contact the DPO through the following *email* address: dpo@regola.it

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3. What kind of personal data we process

- 3.1 **Voluntarily provided common data.**

- a. As a User you can voluntarily provide us with your personal data, including those that allow your identification, during the consultation of our institutional sites or the use of the web services associated with them. This occurs when you contact us for information, when you register with our services or when you fill out our forms on the related pages.
- b. As a User you can choose to provide us with further information when you contact us or otherwise interact with us. We collect your personal data when you communicate with us in person, using the contact information we have provided you with on our websites or through any other means. For example, if you write an email to us we collect your contact details and the details of the messages exchanged (including data relating to when you sent them, when we received them and in some cases, if you use a company email, even the company from where you sent them).
- c. If you wish to access specific services you may have to create a User Account ("Account"). The information provided during the configuration of the Account depends on the service and may include name, e-mail address, contact details and other data needed to configure the service according to your reasonable expectations and your interests.

- d. If you sign up for our newsletter or other forms of communication we manage, it may be necessary to provide us with your name, e-mail address or other data specifically required each time.

3.2 The data collected automatically by our systems

- a. In addition to the common data that you may want to provide us directly and intentionally as a User, the computer systems and software procedures, used to operate our websites and services, acquire some data during their normal operation, the transmission of which are implicit in the use of Internet communication protocols. When you visit our website, we may automatically collect so-called "browsing data". For instance, these include but are not limited to: IP address, access data, browser type and version, browser plug-in types and versions, operating system and platform, data relating to the visit, including the URL Clickstream through and from our website, products displayed or searched, downloads made, times and duration of visits to certain pages and interaction of a page, and session or system errors.
- b. In some cases, we also collect browsing data through "cookies" or similar technologies. In these cases, if the conditions provided for by the sector legislation exist, you will always be informed by a special banner, through which you can express your consent to the use of cookies. For more information on this, see paragraph 8 (Cookies and other similar technologies).
- c. We also collect browsing data through our security systems (e.g. antivirus software and firewalls) during your browsing on our web pages or your use of our cloud applications.

3.3 Special categories of data

When you visit our websites, we do not collect special categories of personal data (art. 9 of the Regulation).

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4. Data of minors

- 4.1. **Data of minors:** registration to some services (such as the 'Allerte Italia' portal and the FlagMii App) is also allowed to minors who are at least 14 years old. We are aware that minors deserve a specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data. In no case the use of the personal data of minors is allowed for marketing purposes or for creating personality profiles (profiling). Our registration forms always indicate the minimum age required for access to the proposed services.

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5. What we use your personal data for (purpose)

- 5.1. **Provide the requested services:** this includes our commitment to allow you access to the contents of our institutional or service sites.
- 5.2. **Account creation and management:** we process your data for the creation of your Account, to create the authorization profile on our systems and manage our relationship with you. We also process your data to communicate with you about your Account regarding the services to which you have gained access.

- 5.3. **Improve our services and guarantee their operation:** we process your data in order to provide you with constantly improving services in order to better meet your needs.
- 5.4. **Ensuring the correct functioning and safety of our web services:** we process your data to manage sites and services during ordinary maintenance operations, including troubleshooting and to understand any errors encountered during their use. In addition, we record and analyse the data collected automatically by our systems to maintain an adequate level of security and to manage and administer our IT systems in order to correctly configure network protocols, allow the visualisation of screens, of content and to protect the services from viruses, malware, malicious software and unauthorised access.
- 5.5. **Direct Marketing Activities:** we process your data to communicate with you and to keep you updated on our activities and provide you with suggestions and recommendations on projects, products or services that may be of your interest. We will provide you with this information through the contact data you voluntarily provided and authorised. For further information on our marketing activities, see [paragraph 7 \(Commercial communications\)](#) of this policy. We also use your data to communicate with you through social media in order to promote our brand, our products and our services. For more information on on-line or social advertising, see [paragraph 10 \(Social Media and social profiles\)](#) of this policy.
- 5.6. **Examine any complaints and provide you with assistance:** data processing can also be carried out in order to investigate any complaints filed by you or third parties and to provide you with a more efficient assistance service. We can also process your data to guarantee the quality of our handling of complaints or requests to the user support service.
- 5.7. **Recruitment:** we may receive on-line applications sent by *e-mail*. Our *e-mail* address, to which you have freely chosen to submit the application, will receive the data present in the application itself and in the documentation attached to it (including possibly a CV and a cover letter). We will only process your personal data for the purpose of carrying out the selection process, of evaluating and taking a decision regarding your suitability for the role, of communicating with you and of carrying out any verifications. We will also process your data to comply with legal obligations. For further information you can visit our Privacy for Candidates” section on the website privacy.regola.it
- 5.8. **To execute the necessary communications:** we may have to process your data in order to execute the necessary communications in response to requests that we are legally required to satisfy (law enforcement or judicial authorities) or in defence of a right of ours or a third party's.

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6. Why we can process your personal data (lawfulness grounds)

- 6.1. **To fulfil our contractual or pre-contractual obligations - art. 6.1 letter *b* of the Regulations:** this includes, for example: (1) finalise the supply of our services; (2) guarantee access to restricted areas or to applications. If you do not wish to provide the personal data that we need for the provision of the service or for the fulfilment of an obligation by law, this will make it impossible for us to satisfy your request.

- 6.2. **For the pursuit of our legitimate interests** - *art. 6.1 letter f of the Regulations*: this includes, for example: (1) do everything necessary to provide you with our services as a User; (2) ensure that your account is adequately protected and ensure that our website, network and ICT infrastructure are secure and are used appropriately; (3) better understand how our products, services and website are used and implement improvements; (4) ensure the safety of our business and our partners; (5) develop and maintain relationships with suppliers, partners, other companies and with the individuals who work for them. For more information on the legitimate interests applied to specific processes regarding your personal data, please contact us by using the information we provided you with in [Paragraph 2 \(Data Controller\)](#).
- 6.3. **To fulfil a legal obligation to which we are subject** - *art. 6.1 letter c of the Regulation*: for example, to comply with tax obligations, to communicate your data at the request of a governmental or judicial authority;
- 6.4. **To carry out a processing authorised by your free consent** - *art. 6.1 letter b of the Regulation*: for example, in addition to the newsletter service, we may request your consent when using technologies such as cookies. You have the right to withdraw consent at any time without prejudice to the lawfulness of the processing carried out before the withdrawal. For more information regarding your rights, please see [paragraph 15 \(User rights\)](#).

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7. Commercial communications (marketing)

- 7.1. We may use the data you provide for direct marketing purposes in order to send updates, newsletters or other communications that we believe may be of interest to you. On this point, we specify that, without prejudice to the provisions of paragraph 7.2 below, the sending of commercial communications will only take place after acquiring your consent.
- 7.2. **SOFT-SPAM** - If you have not already declined this option, we may send you commercial communications to offer you services or products similar to those you have already used or purchased. This activity (so-called "Soft Spam") bases its legitimacy in our legitimate interest of directly promoting products and services to our customers, as they are already users of products or services similar to those we intend to promote. Soft-Spam can be used even if you have not expressed your explicit consent by using the information you have given us to purchase a product or use a service. In any case, you will always be offered the possibility to unsubscribe from any communication sent. Opposing this process is your right.
- 7.3. Regarding the previous points, we inform you that you can, at any given time, object to the receipt of commercial information, by contacting us through the information we have provided you in [Paragraph 2 \(Data Controller\)](#) or simply by selecting the option to unsubscribe from the newsletter service, always indicated at the bottom of our communications.

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8. Cookies and other similar technologies

- 8.1. As previously stated, we automatically collect data through the use of "cookies". A cookie is a text file containing small amounts of data (referring to your choices, settings and preferences) that a website writes on your device in order not to forget them and to be able to read them during a subsequent access. Some of our website pages use cookies to offer you a better service during subsequent use of the website. You can set your browser to receive a notification before receiving a cookie, in order to have the opportunity to decide whether or not to accept it. It is also possible to set the browser to disable cookies; however, if you do this, some of our websites may not work properly and may forget your settings (e.g. selected language).
- 8.2. In order to ensure compliance with the consent and information requirements provided for by current legislation, we use tracking, monitoring and real-time control technologies of cookies and Tour consent to their use. The updated and detailed information on the items active on our sites are available in the respective privacy policies available on our sites.
- 8.3. We also use reading tracking technologies on our e-mails to check the content preferred by each User, in order to send personalised information. Furthermore, this system helps us understand if your email address is still active and if our mails are being read.

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9. More about Links to other websites

- 9.1. Where we provide links to other websites, that do not belong to our company, we do so exclusively for information purposes. These websites are outside our control perimeter and this policy does not apply. If you access other websites using the links that we have provided, the operators of these sites will act as independent Data Controllers and will be able to collect your data and use it in accordance with their policy on the processing of personal data.
- 9.2. We have no control over and take no responsibility for the accuracy or any other aspect of the information available on these sites. The link to a third-party site cannot be understood as a validation of ours of the contents and services of such subjects. We invite you to carefully examine the Privacy Policy that regulates the third-party sites linked to our websites to have a complete view of the possible use of your personal data.

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10. Social Media and social profiles

- 10.1. We also promote our business through social media in order to develop our brand and make our products and/or services known. The personal data that you will voluntarily provide us through our profiles on social channels will be used exclusively for the purposes set out in this policy and in compliance with the Social Media service regulations.
- 10.2. We may address promotional communications to you, using the contact details of your social profile, regarding products or services advertised on a page or a post of which you have become a "fan" or if you have signed up in "follower group" of a product or service of ours. We consequently assume that, in doing so, you also wanted to manifest a will to

provide your consent to the receipt of promotional messages from us regarding the services and products in which you showed an interest.

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11. Data retention

- 11.1. Your data will be kept for the period necessary to achieve the collection purposes. More specifically:
- The personal data acquired by us or provided by you while browsing our sites (browsing LOG) will be kept for a period not exceeding **12 months**.
 - The personal data processed to provide you with a service or feedback will be kept for the duration of the contract or for the time necessary for the feedback.
 - The data collected through cookies or similar technologies for profiling purposes will be kept for a limited period of time, in order to allow you to analyse and evaluate your preferences, always in compliance with the law and the consent you have previously provided.
 - Your voluntary subscription to a newsletter service will allow us to process your data until you unsubscribe from the service through the appropriate link found in each e-mail. However, the data collected for marketing purposes will be kept for a period in line with your legitimate expectations in consideration of the interest you have shown in receiving updates on our products and services. The monitoring of your interest in receiving communications from us may also be carried out by means of the newsletter service's automatism that allow us to verify, for example, your receipt of the communication and its opening (visualisation).
 - The data of the so-called prospects (potential customers) will be kept for the maximum period provided for in the specific "Policy for Customers, Suppliers and Prospects" published on the website privacy.regola.it
- 11.2. Without prejudice to the retention times referred to in the previous point, the data processed may be successively stored, if appropriate, for the limitation period provided for by the legislation for the protection of related rights, without prejudice in any case to longer retention periods provided for by specific law obligations or sector regulations. For example, for civil purposes, we may keep the data for a period of **10 years** starting from termination of the contractual relationship.

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12. Data and processing security

- 12.1. We have adopted a specific organizational model, called the **Personal Data Management System** (Sistema Gestione Dati Personali - **SGDP**), also based on the ISO 27001 standard guidelines. Taking into account the organization and the expectations of the parties involved, the SGDP System establishes the Leadership and commitment of the Data Controller, through the definition of organizational roles, internal and external responsibilities and authority of the parties involved.

Within the **SGDP**, also integrated with the ISO9001 Quality and ISO27001 Information Security systems, with which it guarantees the adoption of **Integrated Management Systems**, the security objectives are identified and the necessary actions are planned for their implementation. The necessary resources and skills are also guaranteed to constantly

and continuously improve the system over time, periodically checking its field of application and alignment with the corporate objectives.

- 12.2. We have implemented adequate security measures in order to minimise the risks of (even accidental) destruction or loss of the processed data, unauthorised access or processing not permitted or not in compliance with the collection purposes indicated in this policy.
- 12.3. If you have a password that allows you to access our services or websites, it is your responsibility to keep it secure and confidential in order to protect your information.
- 12.4. We encourage you to periodically check the security of the devices you use to access our content or services. You should adopt the use of updated software to protect yourself against malicious code or viruses. The security of the information you transmit to us also depends on the integrity and proper functioning of your IT devices.

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13. To whom we communicate your data

- 13.1. Your personal data are known and processed by our employees and collaborators. These subjects will operate as authorised to the treatment.
- 13.2. Your data may be disclosed to third parties (e.g. Companies/Consulting firms) who provide us with assistance and/or consultancy activities when: (1) it is necessary to involve a third party service provider in order to facilitate or extend our services; (2) when explicitly requested by you; (3) when required by a measure of the judicial authority or by any legal or regulatory obligation; (4) in order to enforce our contracts. On this point, we stress the point that the entities that provide us with a service or that act as our representatives are considered third parties, such as, by way of example and not limited to, subcontractors (including their representatives), professional consultants, IT suppliers, database suppliers, specialists in backup and Disaster recovery, e-mail providers and other service providers necessary to operate or improve our products and services. Our suppliers and service providers will be required to comply with our data processing and security standards. The data we communicate, including your personal data, will be provided only in connection and as strictly necessary for the execution of their function. They will not be allowed to use your personal data for purposes other than those indicated in this policy.
- 13.3. Your personal data may be known and processed by Public Security and Judicial Authorities, in accordance with the law and upon a formal request by these subjects, or in the event that: (1) there are reasonable reasons to believe that the communication of such data is reasonably necessary for an investigation; (2) prevent or take action related to suspicious illegal activities or assist the state control and supervisory authorities; (3) in the event of a legal complaint, if requested, the data may be transferred to defend us from such complaint, (4) to ensure the safety of our users, customers and third parties, (5) to protect our rights and properties and the rights and properties of our customers and third parties.

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14. Transfers to third countries

- 14.1. The Web services we offer are based on private and public Cloud systems with data centers normally located within the European Union. However, due to the characteristics of the cloud services, your personal data may be transferred to countries located outside the European Union. In such cases, we will ensure that appropriate safeguards are guaranteed in accordance with the provisions of the Regulation (articles 44-50). In particular, our websites use some services provided by US companies such as Microsoft Azure, MailChimp, Google Analytics, LinkedIn, etc. These companies, act as Data Processors under art 28 of the GDPR by virtue of specific service agreements and "Data Processing Agreements "(DPA). We undertake to select, where possible, the provision of such services through European datacenters and to periodically (at least annually) verify the certification of such companies to the EU-US Data Privacy Framework (DPF) - adequacy decision of the European Commission (art. 45 of the GDPR).
- 14.2. Translated with DeepL.com (free version)
- 14.3. For more information on the security measures implemented in the case of data transfers outside the European Union, you can contact us using the information we have provided to you in [paragraph 2 \(Data Controller\)](#).

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15. Rights of the user

- 15.1. As a data subject, in accordance with applicable law and in relation to your personal data, you may exercise the following rights:
- (a) **Right to access personal data.** You have the right to obtain confirmation that we either are, or are not, processing your personal data, and in this former case, to obtain access to the personal data processed. You have the right to obtain a copy of the data being processed.
 - (b) **Right to rectify, erase or restrict the processing of personal data.** If you wish to rectify, erase or restrict the processing of your personal data, we invite you to contact us using the information we have provided in [paragraph 2 \(Data Controller\)](#). It is Your responsibility to ensure that You provide truthful, accurate, complete data and keep it up to date.
 - (c) **Right to withdraw consent.** If you have given us consent to the processing of Your data, you can withdraw it at any time.
 - (d) **Right to data portability.** If the processing is based on your consent or on a contract and is carried out by automated means, you have the right to receive personal data concerning yourself and provided to us in a structured, commonly used, machine-readable format, and you have the right to transmit such data to another data controller without hindrance on our part.
 - (e) **Right to object.** As a User, you have the right to object to the processing of Your data in specific circumstances. For example, you can benefit from this right if the processing is based on our legitimate interests (or on those of third parties). It is possible for you to dispute the validity of our legitimate interests, however, we may have the right to continue to process such personal data on the basis of our legitimate interests or when this is relevant in legal actions, or the data is necessary for the assessment, the exercise or the defence of a right in court. You also have the right to object to the processing of Your personal data for direct marketing purposes.
 - (f) **Right not to be subject to an automated decision-making process.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects that concern You or that similarly significantly affect You as an individual. In these cases, you have the right to obtain a human intervention by the data controller, to express your opinion and to object to the decision.

- (g) **Compensation.** We also remind you that anyone who suffers material or immaterial damage caused by a violation of (EU) Regulation 2016/679, has the right to obtain compensation for damages from the data controller or the data processor.
- (h) **Right to lodge a complaint with the supervisory Authority.** We point out that you have the right to lodge a complaint before the independent administrative authority in the Member State of the European Union where you usually reside, where you work, or where an alleged violation of the law on the protection of your personal data has occurred. In Italy, you can file a complaint with the Supervisory Authority “**Garante per la protezione dei dati personali**”.

 Garante per la protezione dei dati personali	
Contact centre:	+39 06.696771
E-mail address:	garante@gpdp.it
PEC address:	protocollo@pec.gpdp.it
Website:	https://www.garanteprivacy.it

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16. How to exercise Your rights

- 16.1. If you have an Account, you can directly access your personal data in order to obtain a copy of it, as well as correct, modify or delete inaccurate data. You also have the possibility to request the closure of your Account at any time by sending a request to privacy@regola.it
- 16.2. If you receive commercial communications or you have subscribed to our information channel through the newsletter service, you can withdraw your consent at any time by clicking on the appropriate link at the bottom of all our communications.
- 16.3. As a data subject, you can exercise your rights through the information indicated in [Paragraph 2 \(Data Controller\)](#). We will use the communication channel of your choice also for (positive or negative) feedback. If you were not to be already identified where the request takes place (e.g. you are not an authenticated User on one of our WEB services), we will ask you, in whatever way the application is presented, to also alternatively attach or provide a document that allows your identification.
- In the event that your application is presented through third parties (for various reasons linked to You), it will be necessary to accompany it with a specific written proxy or other document certifying any powers of attorney.
- Communications and feedback actions undertaken pursuant to articles from 15 to 21 of the Regulations are free.
- However, should the outcome of the verification you have requested as a data subject, not confirm the existence, or even past existence, of data concerning you, or it appears that the request is manifestly excessive and/or repetitive, we may be in a position to request that You make contribution towards the costs, only for the requests referred to in articles from 15 to 21 of the Regulation.
- We inform you that the burden of proving the manifestly unfounded or excessive nature of your request is incumbent on the Data Controller. In any case, the contribution requested from you will never exceed the actually incurred and documented costs for the specific case.

- 16.4. To exercise your rights against the Data Controller, it is advisable to use the appropriate form – “Modello esercizio diritti in materia di protezione dei dati personali” – available on the website [garanteprivacy.it](https://www.garanteprivacy.it)

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17. Amendments to the policy

17.1. Document GDPR-006 rev. 02 of 29/03/2024

This policy is periodically updated to keep you constantly informed.

If the policy is amended in its fundamental parts (such as the purposes, methods, to whom we communicate the data, where we transfer them, etc.), we will make sure you will be notified of such changes.

Regola S.r.l.

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Privacy: to consult the complete Privacy Policies of Regola S.r.l.
please visit the website privacy.regola.it



GDPR-006.EN

REV.2 29/03/2024

PUBLIC DOCUMENT